DRIFT MANAGEMENT PLAN

Our establishment uses a written drift management plan to minimize the occurrence of off-target drift. All pesticide applications conducted at this firm are made in accordance with this plan. Application records serve as the record for use of this plan. However, if drift does occur, the applicator will record those incidents on the back of this form. Records shall be maintained for at least one year for any general-use pesticide application and for at least three years for any restricted-use pesticide application. Recognizing that pesticide applications shall be made in a manner that prevents off-target direct discharges of pesticides, and in keeping with certain requirements of Rule 10 of Regulation 637, our drift management plan includes the following:

- A. Procedures used when applying pesticides.
- B. Procedures used when off-target drift is anticipated due to the nature of the application.
- C. Procedures used when off-target drift in NOT anticipated, but does occur.
- D. Review record sheet.
- E. Site record sheet.

Note that for the purposes of this plan, off-target drift does <u>not</u> include off-target movement of a pesticide by means of erosion, volatilization, or windblown soil particles after the application of a pesticide unless the pesticide label makes specific statements pertaining to drift related to these means. Our pesticide applicator should recognize that operating under a drift management plan does not exclude an applicator from complying with appropriate federal or state statues and regulations. However, the Michigan Department of Agriculture will consider the presence and proper use of a drift management plan as a factor when determining appropriate enforcement action should enforcement action be deemed appropriate.

A. To minimize the incidence of off-target drift, the following procedures and practices shall be utilized when applying pesticides:

- 1. Use of the largest spray droplets that provide effective coverage of the target site. This can be achieved by use of appropriate nozzles and the lowest pressure possible that still provides effective coverage. Larger droplets are not as likely to drift as smaller droplets
- 2. Use of drift control additives when appropriate. Drift control additives reduce the potential for drift.
- 3. Release of the pesticide as close as possible to the target. By having less distance to travel to the target, the potential for drift is reduced.
- 4. Use of the lowest effective rates of application. Lower rates of application results in less material being dispersed and less potential for drift.
- 5. Determine the wind speed, using a hand-held wind meter when necessary. The following guidelines are suggested:
 - a. Zero to 5 mph Generally OK to spray. Use normal precautions.
 - b. 5 to 10 mph Use extra caution when spraying. Consider use of drop spreader with granular material for turf sites.
 - c. 10 mph or more Recommended not to spray.
 - d. If area being treated is sheltered from the wind, then wind speed can be worked with depending on area involved.
- 6. Wind blocks may be used to contain or deflect spray or to block wind from the target site.
- 7. Target sites located in close proximity to the property line may need to be omitted or only partially sprayed to avoid off-target drift.

B. When pesticide drift is anticipated due to the nature of the application, the applicator shall:

- 1. Attempt to secure prior informed consent of residents in the affected area(s). Oral consent is acceptable, but written consent is preferred.
- 2. If contact with the affected residents is not possible <u>or</u> if consent to drift is not obtained, the applicator shall employ all effective methods for drift control.
- 3. Any questionable areas of sensitive sites should be discussed with management before proceeding with the spray. Do not spray when property boundaries are not clearly defined or are questionable.
- 4. If, after all precautions are taken, off-target drift still occurs, appropriate notification (including signs) shall be made to notify the property owner of the occurrence.

C. Procedures to use when off-target drift is NOT anticipated, but does occur.

- 1. When off-target drift is NOT anticipated, but does occur, the applicator shall attempt to notify the affected residents verbally. If residents can not be provided verbal notice, the applicator shall post the appropriate signs before leaving the site of application.
- 2. Firm management shall be notified of the occurrence of off-target drift by the applicator immediately.
- 3. Maintain a record at the office of all sites where this drift management plan was implemented. Records shall be maintained for a period of 1 year for general use pesticide products and 3 years for restricted use products and shall be provided to the MDA upon request.

| <u>Name</u> | <u>Date</u> | | | |
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| When an incident of necessary. | drift occurs, the app | licator shall make a re | cord of the site where the plan wa | s implemented. Use additiona |
| <u>Date</u> | <u>Location</u> | <u>Notes</u> | | |
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